

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JAMES BROWN III,

Plaintiff,

v.

DG FRESH DISTRIBUTION MO, LLC,

Defendant.

Case No.: _____

DECLARATION OF NIKI STINESPRING

I, Niki Stinespring, declare as follows:

1. I am employed by Dollar General Corporation as the Senior Director, Supply Chain HR. I am authorized to make this declaration on behalf of Defendant DG Fresh Distribution MO, LLC ("Defendant"). I have personal knowledge of the facts set forth in this declaration or know them in my capacity as a representative of Defendant. If called as a witness, I could and would competently testify thereto. I am over 18 years of age.

2. In my role with Dollar General Corporation, I am familiar with the corporate structure and operations of Dollar General Corporation and its subsidiaries and related entities, including Defendant. In this capacity, I also have access to Defendant's employee and payroll records as well as other related corporate and business records.

3. Defendant is, and was at the time this action commenced on November 12, 2021, a limited liability company organized and existing under the laws of Tennessee, and Defendant's sole member is Dollar General Corporation.

4. Dollar General Corporation is, and was at the time that this action commenced on November 12, 2021, a corporation organized and existing under the laws of Tennessee.

5. Dollar General Corporation has, and at all relevant times had, its headquarters and principal place of business in Goodlettsville, Tennessee. The Tennessee headquarters is and has been the place where the majority of Dollar General Corporation's books and records are located and where the majority of its executive and administrative functions (including but not limited to operations, corporate finance, accounting, human resources, payroll, marketing, legal, and information systems) are and have been performed.

6. Dollar General Corporation's officers (including but not limited to its chief executive officer) work and have worked out of the Goodlettsville headquarters, and Dollar General Corporation's business activities have been directed, controlled, and coordinated from there at all relevant times.

7. Dollar General Corporation has never been incorporated in Missouri and has never had its headquarters, executive offices, or officers based in Missouri. It has never maintained a principal place of business in Missouri.

8. I have reviewed Defendant's payroll and personnel records related to Plaintiff James Brown III ("Plaintiff"), who was an employee of Defendant prior to his termination on or around August 3, 2020. Those records reflect that at the time Plaintiff applied to work for Defendant, and at all times during Plaintiff's employment with Defendant, he lived in and was a resident of Missouri.

9. Defendant's records further reflect that throughout Plaintiff's employment with Defendant, he worked at Defendant's facility located within Missouri.

10. Defendant's records further reflect that Plaintiff's annual salary immediately prior to his termination was \$65,000 per year.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 22, 2022, at Nashville, Tennessee.


NIKI STINESPRING